



Nuclear Watch of New Mexico's Summary of its LANL BSL-3 NEPA Comments

Los Alamos National Laboratory (LANL) under the direction of the Department of Energy (DOE) and the National Nuclear Security Administration's Chemical and Biological National Security Program is proposing to build a biological research laboratory. This laboratory, called a Biosafety Level (BSL) facility class 3, is specifically designed to study dangerous aerosolized biological organisms. The organisms that could be studied at this bio-lab include such dangerous organisms as infectious strains of *Bacillus anthracis*. *Bacillus anthracis* is the bacterium that causes the fatal human disease anthrax.

Nuclear Watch of New Mexico (NWNM) recently submitted scoping comments to the DOE Albuquerque Operations Office National Environmental Policy Act (NEPA) Compliance Officer in Los Alamos. In these comments, NWNM raised several serious concerns that it has over the proposed bio-lab. Firstly, the risks to human health and the environment are unknown should a toxic biological organism such as the one that causes anthrax or the plague escape from the laboratory. The chances of escape are also too high given LANL's poor safety record with the inorganic compounds that it currently handles, such as uranium, plutonium, and tritium. All of these elements have, to varying degrees, been released into the environment through LANL's nuclear weapons research facilities. What are the risks imposed upon by an organic organism that is capable of breeding and multiplying? LANL does not know, nor do they have adequate safety measures developed in the event that such an organism were to escape from its containment into either the bio-lab itself or into the surrounding environment. The DOE's own Office of Inspector General released a report citing numerous safety and administrative violations at DOE's national laboratories across the nation. One of the issues that the Inspector General raised was the fact that LANL lacked a comprehensive safety plan to respond to any incident involving breach of containment. Yet, despite LANL's lack of a bio-safety plan, they had already been studying weakened strains of *Bacillus anthracis*, according to the Inspector General. And plans were already being developed to study fully infectious forms of the organism as well.

The comments that NWNM submitted also addressed concerns that LANL had not included this biological research as part of their 1999 Site-Wide Environmental Impact Statement (Site-Wide EIS). The Site-Wide EIS is intended to be an analysis of all existing activities and near future plans for a large facility and the impacts on the human environment, natural environment, and social consequences of those activities. Because the Site-Wide EIS did not include the bio-laboratory, NWNM argues in its comments that under NEPA Rules and Regulations, a full EIS must be conducted on the proposed bio-laboratory to assess the consequences of its proposed and potential activities. This is particularly important when the impact on human health and the environment is unknown, yet it is clear that they could be disastrous, according to the National Nuclear Security Administration. In its report entitled Chemical and Biological National Security Program FY00 Annual Report it is stated that in "A hypothetical attack on Los Angeles using 5 kg of anthrax leads to an estimate of 115,000 symptomatic people. Without medical intervention, 66,500 would ultimately die." (p. 58)

In addition to these concerns, NWNM has additional concerns related to the DOE's biological research program at its laboratories across the nation. The research on biological agents is a dramatic expansion of the DOE's existing nuclear weapons mission. As a result of this expansion in mission, it is believed that DOE is required under NEPA Rules and Regulations to conduct a Programmatic review of its biological research programs. It is also believed that this review MUST be conducted before LANL continues with its biological research, the EA of its BSL-3 laboratory, or any other further reviews under NEPA of this facility.

Lastly, NWNM is concerned about the possible missions of both LANL's bio-laboratory and the entire Chemical and Biological and National Security Program. This concern is particularly heightened by the recent Bush Administration to withdraw U.S. support of the negotiations for the verifications protocols under the Biological Weapons Convention. NWNM submitted an addendum to the July 2001 comments on August 2, 2001 which covered these concerns more explicitly.

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